

**Federal Defenders
OF NEW YORK, INC.**

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December 7, 2022

By ECF

MEMO ENDORSED

Honorable Edgardo Ramos
United States District Judge
Southern District of New York

Re: *United States v. Mario Lucas*, 22 Cr. 533 (ER)

Dear Judge Ramos:

I write to respectfully request that the Court adjourn the December 15, 2022 conference in this matter for approximately 60 days. This is my first request for an adjournment. The Government consents. I make this request because I require additional time to continue to review the voluminous discovery in this matter and to continue plea negotiations (which have already begun) with the Government, which will potentially obviate the need for a trial.

Should the Court grant an adjournment, I consent to an exclusion of Speedy Trial time until the adjourn date.

Thank you for your attention to this request.

Respectfully submitted,

/s/ Jonathan Marvinny

Jonathan Marvinny
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cc: Government counsel

The pretrial conference is adjourned to February 17, 2023 at 10 a.m.

SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 12/8/2022

New York, New York